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May 11, 2021

BY ECF

Hon. Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Maliek Brown v. City of New York, et al., 19 CV 1575 (NG)(RML)

Your Honor:

I represent the plaintiff. I write to request an extension of discovery from May 14, 2021 until August 15, 2021. Defendants consent to this request.

This extension is required due to the difficulties experienced as a result of working from home and other issues related to the COVID-19 pandemic, as well as issues relating to the procurement of certain records¹; and an unusually broad scope of issues and alleged damages.

Just this past week defendants have finalized their disclosures of all necessary parties and plaintiff, with the consent of the defendants, filed his Third and Fourth Amended complaint naming these parties.

To date, the parties have responded to discovery demands, exchanged paper discovery, procured voluminous medical records, engaged in extensive case discussions and settlement negotiations, and taken plaintiff's deposition. The parties are scheduling defendants' depositions and at present, there are no contested discovery issues.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s

Robert Marinelli

cc: ACC Joseph Zangrilli

¹ The parties continue to request, and receive, medical records from health providers plaintiff has seen through the course of his life. Additionally, certain necessary identifying documents have just recently been provided by the NYPD.